

MOENCH LAW, LLC

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Attorney for Plaintiffs,

Michael Thulen, Jr., Michael Porter,

and Terence Gaudlip

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHAEL THULEN JR., et al.

Plaintiffs,

vs.

**AMERICAN FEDERATION OF
STATE, COUNTY AND MUNICIPAL
EMPLOYEES, NEW JERSEY
COUNCIL 63, et al.,**

Defendants

DOCUMENT ELECTRONICALLY
FILED

Civil Action No. 1:18-cv-14584-RMB-
AMD
Hon. Renee Marie Bumb

ORAL ARGUMENT REQUESTED

**NOTICE OF CROSS-MOTION FOR DECLARATION OF
CONSTITUTIONAL RIGHT**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on July 1, 2019 at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for Plaintiffs, Michael Thulen, Michael Porter, and Terence Gaudlip, shall move pursuant to Local Civil Rule 7.1 before the

Honorable Renee Marie Bumb at the United States District Court for the District of New Jersey, Mitchell H. Cohen Building and U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101 for an order declaring that union members have a Constitutional right to leave the union and cease making payments at any time pursuant to the rights protected in the First and Fourteenth Amendments, and articulated in Janus v. AFSCME Council 31, 585 U.S. ____ (2018).

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon their Memorandum of Law in Opposition to Defendants' Motions to Dismiss and in Support of Plaintiffs' Cross-Motion, supporting Declaration of Matthew C. Moench, Esq., and proposed form of Order filed herewith in support of this application.

DATED: June 14, 2019

Respectfully submitted,

MOENCH LAW, LLC
1303 Roger Avenue
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By: /s/ Matthew C. Moench
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